

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF  
TELECOMMUNICATIONS AND ENERGY TO KEYSpan ENERGY DELIVERY

D.T.E. 05-40

Respondent: John Allocca

Date: August 2, 2005

Information Request DTE 1-18

Q. Please refer to JEA-19. Please provide the workpapers and assumptions that were made to create the Exhibit. Explain in detail what is meant by a “rearview mirror forecast.”

A. Exhibit JEA -19 was developed by KeySpan based in part on a confidential and proprietary forecast of future prices developed by CERA under their *rear view mirror economic view*. Attachment 1-18 is a narrative description of the rear view mirror economic assumptions made by CERA.

Attachment DTE 1-18 is a proprietary product of CERA available only through a contract with CERA. Public disclosure would cause economic harm to CERA in that it would make available for free a product to which CERA is normally entitled a fee. Accordingly this attachment is provided subject to the Company’s May 23, 2005 motion for protective treatment of confidential information and the Company respectfully requests that this attachment be protected from public disclosure in accordance with G.L. c. 25 section 5D